

Exhibit XX

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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EASTERN PROFIT CORPORATION LIMITED,

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Plaintiff/Counterclaim Defendant,

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-against- Case No. 18-cv-2185 (JGK)

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STRATEGIC VISION US, LLC,

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Defendant/Counterclaim Plaintiff,

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-against-

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GUO WENGUI a/k/a MILES KWOK,

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Counterclaim Defendant.

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CONTINUED DEPOSITION OF

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GUO WENGUI

17

New York, New York

18

December 4, 2019

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REPORTED BY: TERRI FUDENS

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FILE NO: AD0BC41

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<p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK</p> <p>-----X</p> <p>EASTERN PROFIT CORPORATION LIMITED, Plaintiff/Counterclaim Defendant,</p> <p>V.</p> <p>STRATEGIC VISION US, LLC, Defendants/Counterclaim Plaintiff.</p> <p>-----X</p> <p>Continued Deposition of GUO WENGUI a/k/a MILES KWOK, a Counterclaim Defendant here, taken by the Defendant-Counterclaim Plaintiff pursuant to Court Order held at 605 Third Avenue, New York, New York, commencing at 11:03 A.M., Wednesday, December 4, 2019, before Terri Fudens, a Stenotype Reporter and Notary Public of the State of New York.</p> <p style="text-align: right;">Page 235</p>	<p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>ALSO PRESENT:</p> <p>French Wallop Yvette Wang Thomas Del Vecchio, Videographer Victor Chang, Interpreter Una Wilkinson, Interpreter</p> <p style="text-align: right;">Page 237</p>
<p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>APPEARANCES:</p> <p>PEPPER HAMILTON LLP Attorneys for Plaintiff/Counterclaim Defendant - Eastern Profit Corporation, Ltd. 1313 North Market Street Suite 5100 Wilmington, Delaware 19801</p> <p>BY: CHRIS CHUFF, ESQ.</p> <p>GRAVES GARETT LLC Attorneys for Defendant/Counterclaim Plaintiff - Strategic Vision US LLC 1100 Main Street, Suite 2700 Kansas City, Missouri 64105 816.2563181</p> <p>BY: EDWARD D. GREIM, ESQ. edgreim@gravesgarrett.com</p> <p>JENNIFER DONNELLI, ESQ. jdonnelli@gravesgarrett.com</p> <p>GOLDEN SPRING (NEW YORK) LTD. In-House Counsel for Golden Spring 162 E. 64th Street New York, New York 10065 917.941.9698</p> <p>BY: DANIEL PODHASKIE, ESQ.</p> <p>HODGSON RUSS Attorneys for Guo Wengui a/k/a Miles Kwok, a Counterclaim Defendant 605 Third Avenue, Suite 2300 New York, New York 10158 646.218.7616</p> <p>BY: MARK A. HARMON, ESQ. ERIN TESKE, ESQ.</p> <p style="text-align: right;">Page 236</p>	<p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: center;">I N D E X</p> <p>WITNESS: EXAMINATION BY: PAGES:</p> <p>Guo Wengui Mr. Greim 240</p> <p style="text-align: center;">E X H I B I T S</p> <p>GUO: DESCRIPTION: PAGES:</p> <p>10 A black page with a label on 243 the front which begins with Bates number SVUS 1305 through 1440</p> <p style="text-align: right;">Page 238</p>

2 (Pages 235 to 238)

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<p>1 GUO WENGUI 2 provide me with a copy of the flash 3 drive so that at some point we can 4 verify or be in a position to verify 5 that the video you're playing is 6 video one on that drive. 7 Q I will now play the video. 8 MR. HARMON: Mr. Greim, will you 9 provide us with a copy of the flash 10 drive? 11 MR. GREIM: Yes. 12 (At this time the flash drive 13 was played.) 14 Q Mr. Guo, my question to you is was 15 that your voice? 16 A I would have no way to make sure. 17 MR. HARMON: I do want the 18 record to reflect that the video is 19 not a video of Mr. Guo or of any 20 person. It's a video of a voice 21 recording. 22 INTERPRETER WILKINSON: I think 23 counsel was saying that this is not a 24 video. This is just a voice 25 recording.</p> <p style="text-align: right;">Page 247</p>	<p>1 GUO WENGUI 2 These are two fraudsters. 3 Q Is the recording that we just 4 listened to the recording that you testified 5 earlier you had made with a CCP or PRC official in 6 March of 2017? 7 A Can you repeat it. 8 Q Sure. Is the recording that we just 9 listened to the recording that you testified 10 earlier that you had made in March of 2017 of a 11 conversation between you and a CCP or PRC 12 official? 13 A No. 14 Q What do you recall about the 15 recording that you made in March of 2017 of a 16 conversation between yourself and a CCP or PRC 17 official? 18 MR. HARMON: Object to the form 19 of the question. Vague and 20 ambiguous. 21 You can interpret the question, 22 my objection, and then his answer. 23 INTERPRETER WILKINSON: I 24 believe that the counsel said do you 25 recall.</p> <p style="text-align: right;">Page 249</p>
<p>1 GUO WENGUI 2 INTERPRETER CHANG: May I speak 3 now? 4 MR. HARMON: There's no question 5 pending. 6 Q My question to you is is that your 7 voice? Is the voice that we just played that was 8 recorded in video 1 your voice? 9 MR. HARMON: Asked and answered. 10 Answer again. 11 A No, because I was looking at the -- 12 INTERPRETER WILKINSON: 13 Interpret what the witness said 14 first. The witness is saying: 15 A I was watching a voice recording, not 16 a video. But I said I was looking at this one, 17 and it obviously has an image and the voice. When 18 I want to say is I have never seen this video, and 19 I have never listened to the voice. 20 This is 100 percent not in my account 21 of YouTube. I really want to find out myself 22 where he got this, and I don't have no idea. The 23 two fraudster lawyers obtained this video, and I 24 want to know where they got it, and I want to 25 appeal to the court. And this is not right.</p> <p style="text-align: right;">Page 248</p>	<p>1 GUO WENGUI 2 MR. HARMON: What do you recall? 3 INTERPRETER WILKINSON: What do 4 you recall about that recording of 5 the conversation that you have made 6 in March, 2017. 7 INTERPRETER CHANG: I have 8 trouble to stick to the word. How do 9 you recall a recording? 10 How do you know that you recall 11 a recording. You call and you made a 12 recording of what you record the 13 accountant of a recording if you -- I 14 mean to my way of interpretation, you 15 have to make sense of the question, 16 otherwise the -- 17 Q I don't understand the dispute, but I 18 will ask for the witness' question. Actually, I 19 will withdraw it and I'll ask a different 20 question. There's already a form objection 21 anyway. Let me ask a new question. 22 Who was your March of 2017 discussion 23 that you testified to earlier with? 24 A I really can't answer this question 25 because I have tens of thousands of conversations</p> <p style="text-align: right;">Page 250</p>

5 (Pages 247 to 250)

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<p>1 GUO WENGUI</p> <p>2 and recordings of which one that you want me to --</p> <p>3 INTERPRETER CHANG: He said:</p> <p>4 A I have had the conversations with the</p> <p>5 tens of thousands of people, and how would I pick</p> <p>6 one now? Which one do I remember in particular?</p> <p>7 Q Sir, I'm asking you about the</p> <p>8 conversation that you said that you had had in</p> <p>9 March of 2017 with a CCP or a PRC official and</p> <p>10 that you're recording. That's the conversation</p> <p>11 I'm asking you about.</p> <p>12 A CCP. CCP. He wanted me to spell out</p> <p>13 what is a CCP and CCI.</p> <p>14 INTERPRETER WILKINSON: PRC.</p> <p>15 A I had a conversation with a CCP</p> <p>16 official by the name of Liu Yan Ping. I had a</p> <p>17 conversation with that person, and I had a</p> <p>18 recording of that conversation.</p> <p>19 Q Was that conversation in March of</p> <p>20 2017?</p> <p>21 A Approximately, yes, that timing.</p> <p>22 Q Did you have conversations with any</p> <p>23 other CCP or PRC officials in March of 2017?</p> <p>24 A I don't really remember.</p> <p>25 Q Is the recording that we just</p> <p style="text-align: right;">Page 251</p>	<p>1 GUO WENGUI</p> <p>2 about this. Is it your testimony that the</p> <p>3 recording that we just listened to is fake?</p> <p>4 MR. HARMON: Object to the form</p> <p>5 of the question. You can translate</p> <p>6 my objection.</p> <p>7 A I want to know if this is fake or</p> <p>8 this is not fake.</p> <p>9 Q Mr. Guo, either that is your voice or</p> <p>10 it is not. My question to you, which I still</p> <p>11 don't have an answer to, is is that your voice, or</p> <p>12 do you claim it's an imposter?</p> <p>13 MR. HARMON: Object to the form</p> <p>14 of the question. Asked and answered.</p> <p>15 A That I would not know.</p> <p>16 Q Is it true that in March of 2017 you</p> <p>17 had absolute faith in General Secretary Gui?</p> <p>18 A I don't have any confidence in him.</p> <p>19 Only you may have. I want him to die fast.</p> <p>20 That's my 100 percent hatred of him.</p> <p>21 This is like you are making a naked</p> <p>22 lie. How can you live with who harmed your whole</p> <p>23 family? How can you love a leader?</p> <p>24 INTERPRETER WILKINSON: He</p> <p>25 hasn't finished.</p> <p style="text-align: right;">Page 253</p>
<p>1 GUO WENGUI</p> <p>2 listened to a discussion between you and Mr. Liu</p> <p>3 Yan Ping?</p> <p>4 A I don't know. I think I never --</p> <p>5 this is ridiculous because this is not under my</p> <p>6 YouTube account and the technical. It's so easy</p> <p>7 for anyone to make a fake conversation.</p> <p>8 I want to know where this came from</p> <p>9 and whose conversation was this with. And I want</p> <p>10 my attorney to make the effort to find out the</p> <p>11 source of whatever I listen to just now.</p> <p>12 Q First of all, what is your YouTube</p> <p>13 account?</p> <p>14 MR. HARMON: Object to the form</p> <p>15 of the question.</p> <p>16 A He said this is a fake attempt</p> <p>17 because you did not even make sure that my account</p> <p>18 is my account. I don't understand the English</p> <p>19 account as to how they are formed. I know my</p> <p>20 account have G-U-O, my last name in it. But there</p> <p>21 is none.</p> <p>22 If you didn't make the effort to make</p> <p>23 sure that is a part of the account, then how you</p> <p>24 can present this as my YouTube account?</p> <p>25 Q Mr. Guo, I want to be very clear</p> <p style="text-align: right;">Page 252</p>	<p>1 GUO WENGUI</p> <p>2 A How can you love a leader that</p> <p>3 detained 270 of your employees? How can you love</p> <p>4 a leader who put 2 million Muslims in camps? How</p> <p>5 can you have a confidence in a leader who wants to</p> <p>6 kill all Americans and how can you have confidence</p> <p>7 in such a leader. This is the just ridiculous.</p> <p>8 And maybe only the two cheaters you are</p> <p>9 representing, they might be able to love such a</p> <p>10 leader.</p> <p>11 INTERPRETER WILKINSON: He also</p> <p>12 said that how can you love such a</p> <p>13 leader that he raped Hong Kong.</p> <p>14 A In addition, how can you leave a</p> <p>15 leader who is raping Hong Kong and also Taiwan.</p> <p>16 MR. GREIM: Move to strike as</p> <p>17 nonresponsive. I have a new question</p> <p>18 for you.</p> <p>19 A I haven't finished yet. If you don't</p> <p>20 want me to say anything or if you don't want me</p> <p>21 say what I want to say, I will leave then.</p> <p>22 Q I want you to answer the question.</p> <p>23 MR. HARMON: He did answer the</p> <p>24 question.</p> <p>25 MR. GREIM: No, he didn't.</p> <p style="text-align: right;">Page 254</p>

6 (Pages 251 to 254)

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<p>1 GUO WENGUI</p> <p>2 Q Did you make any video recordings of</p> <p>3 your meeting with Liu Yuan Ping and his entourage?</p> <p>4 A Yes.</p> <p>5 Q How many hours?</p> <p>6 A I don't recall.</p> <p>7 Q Where are the video recordings?</p> <p>8 MR. HARMON: Object to the form</p> <p>9 of the question.</p> <p>10 A What he said, I don't remember.</p> <p>11 Q Did you use microphones to make any</p> <p>12 voice recordings of your meetings with Liu Yuan</p> <p>13 Ping and his entourage?</p> <p>14 A No.</p> <p>15 Q Did you share any video or voice</p> <p>16 recordings of your meetings with Liu Yuan Ping and</p> <p>17 his entourage with any media?</p> <p>18 MR. HARMON: Object to the form</p> <p>19 of the question.</p> <p>20 A During an interview with the VOA I</p> <p>21 shared with them a clip of a video, the voice of</p> <p>22 America.</p> <p>23 Q Who was on that video?</p> <p>24 A Liu Yuan Ping and his three people</p> <p>25 with him, and myself also. I corrected what I</p> <p style="text-align: right;">Page 271</p>	<p>1 GUO WENGUI</p> <p>2 of the question.</p> <p>3 A After my interview with the Wall</p> <p>4 Street Journal.</p> <p>5 INTERPRETER WILKINSON: Do you</p> <p>6 know the check interpreter raised a</p> <p>7 point that when the witness is asking</p> <p>8 a question about the -- your</p> <p>9 counsel's question asked, can the</p> <p>10 interpreter repeat, interpret what</p> <p>11 the witness asked in English instead</p> <p>12 of answering it even though maybe he</p> <p>13 knows the answer that is just to</p> <p>14 repeat your question. But can</p> <p>15 just -- can he just interpret what</p> <p>16 the witness said in English to you?</p> <p>17 Is this possible?</p> <p>18 INTERPRETER CHANG: I'm trying</p> <p>19 to catch what you were saying.</p> <p>20 MR. GREIM: I understand the</p> <p>21 question. Basically I don't want to</p> <p>22 do that, or we will never get</p> <p>23 anything done. I am willing to allow</p> <p>24 you and the main interpreter to speak</p> <p>25 in Chinese with the witness to</p> <p style="text-align: right;">Page 273</p>
<p>1 GUO WENGUI</p> <p>2 said. It's not was VOA. It was MIN G. JING.</p> <p>3 That is the media in the organization. I shared</p> <p>4 that video with that media organization.</p> <p>5 Q Did you share the video or any voice</p> <p>6 recording with the Wall Street Journal?</p> <p>7 A Yes, I shared with the Wall Street</p> <p>8 Journal a video.</p> <p>9 Q What equipment did you use to record</p> <p>10 the meetings?</p> <p>11 A I don't remember.</p> <p>12 Q Who assisted you in making the</p> <p>13 recordings?</p> <p>14 MR. HARMON: Object to the form</p> <p>15 of the question.</p> <p>16 A My answer is I don't exactly recall</p> <p>17 which company assisted me.</p> <p>18 Q Is it your testimony that the</p> <p>19 recordings no longer exist?</p> <p>20 MR. HARMON: Object to the form</p> <p>21 of the question, and also asked and</p> <p>22 answered.</p> <p>23 A No. I cannot be certain about that.</p> <p>24 Q When did you last see the videos?</p> <p>25 MR. HARMON: Object to the form</p> <p style="text-align: right;">Page 272</p>	<p>1 GUO WENGUI</p> <p>2 clarify what my question is, but I</p> <p>3 don't want to have that entire</p> <p>4 discussion translated back in</p> <p>5 English, or we'll have translations</p> <p>6 within translations?</p> <p>7 INTERPRETER WILKINSON: No. No.</p> <p>8 No. It's just that the witness is</p> <p>9 asking.</p> <p>10 MR. HARMON: Time out. Let's do</p> <p>11 it. The interpreter is going to</p> <p>12 interpret. If you believe that</p> <p>13 something that's being said in</p> <p>14 Chinese needs to be on the record in</p> <p>15 order to provide clarity, let us</p> <p>16 know. Otherwise, let's move on.</p> <p>17 MR. GREIM: Thank you,</p> <p>18 Mr. Harmon. I agree with that.</p> <p>19 Q Now have you posted any of the audio</p> <p>20 recordings or any voice element of the audio</p> <p>21 recordings on the Internet?</p> <p>22 MR. HARMON: Object to the form</p> <p>23 of the question.</p> <p>24 A Yes, I posted every recording, video</p> <p>25 or audio, I have on the Internet recording I had</p> <p style="text-align: right;">Page 274</p>

11 (Pages 271 to 274)

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<p>1 GUO WENGUI</p> <p>2 with the CCP on the Internet.</p> <p>3 This is a total crazy because two</p> <p>4 people who are paying you and they are they spies</p> <p>5 of communist party. Have you ever seen a spy who</p> <p>6 would post their conversations on the Internet?</p> <p>7 And I posted everything I had at the wisdom on the</p> <p>8 Internet. How could they accuse me of being spy?</p> <p>9 Your fee is paid by a third party,</p> <p>10 but why can't you publicize the source of your</p> <p>11 fees on the Internet?</p> <p>12 MR. GREIM: Okay. I move to</p> <p>13 strike all this as non-responsive.</p> <p>14 We're no longer answering any</p> <p>15 questions that I've asked. We're</p> <p>16 going to move on.</p> <p>17 Q What happened to the video or audio</p> <p>18 recordings that you had made of your meetings with</p> <p>19 Liu Yuan Ping?</p> <p>20 A I don't know.</p> <p>21 Q What happened to the cell phone</p> <p>22 recordings that you made of your phone discussions</p> <p>23 with Liu Yuan Ping?</p> <p>24 A I don't know.</p> <p>25 Q Where were you storing the video or</p> <p style="text-align: right;">Page 275</p>	<p>1 GUO WENGUI</p> <p>2 THE VIDEOGRAPHER: The time is</p> <p>3 12:29 p.m. on Wednesday, December</p> <p>4 4th.</p> <p>5 This is the end of media number</p> <p>6 1, volume 2 of the videotaped</p> <p>7 deposition of Mr. Guo Wengui.</p> <p>8 Off the record.</p> <p>9 (At this time, a brief recess</p> <p>10 was taken.)</p> <p>11 THE VIDEOGRAPHER: The time is</p> <p>12 12:40 p.m., Wednesday, December 4,</p> <p>13 2019. This is media number 2, volume</p> <p>14 2 of the videotaped deposition of</p> <p>15 Mr. Guo.</p> <p>16 We are back on the record.</p> <p>17 CONTINUED EXAMINATION</p> <p>18 BY MR. GREIM:</p> <p>19 Q Mr. Guo, are you aware of any</p> <p>20 recordings of your discussions with CCP or PRC</p> <p>21 officials that were made without your consent?</p> <p>22 MR. HARMON: Object to the form</p> <p>23 of the question.</p> <p>24 A I don't know.</p> <p>25 Q Are you aware of any discussions that</p> <p style="text-align: right;">Page 277</p>
<p>1 GUO WENGUI</p> <p>2 audio recordings of your in-person discussions</p> <p>3 with Liu Yuan Ping or your phone discussions with</p> <p>4 Liu Yuan Ping?</p> <p>5 MR. HARMON: Object to the form</p> <p>6 of the question.</p> <p>7 A I really don't know.</p> <p>8 Q Did you post any of the 100 hours of</p> <p>9 phone discussions with Liu Yuan Ping on the</p> <p>10 Internet?</p> <p>11 MR. HARMON: Object to the form</p> <p>12 of the question.</p> <p>13 A This is not accurate. This is like</p> <p>14 the fakery. I never said I made a recording of</p> <p>15 100 or over 100 hours of conversations. I only</p> <p>16 said I have a small portion of the conversations</p> <p>17 and recordings.</p> <p>18 Q Did you ever post any of the</p> <p>19 recordings you made of the phone conversations</p> <p>20 with Liu Yuan Ping?</p> <p>21 A I already answered the question. I</p> <p>22 posted all the recordings of what I made of</p> <p>23 conversations on the Internet.</p> <p>24 MR. GREIM: Let's go ahead and</p> <p>25 take our first break.</p> <p style="text-align: right;">Page 276</p>	<p>1 GUO WENGUI</p> <p>2 have taken place in your apartment that have been</p> <p>3 placed on the Internet without your consent?</p> <p>4 MR. HARMON: So Mr. Greim,</p> <p>5 unless you narrow the subject matter,</p> <p>6 that question is beyond the scope of</p> <p>7 what the court allowed you to ask.</p> <p>8 MR. GREIM: Okay.</p> <p>9 Q Are you aware of any recordings of a</p> <p>10 conversation between you and any CCP or PRC</p> <p>11 official that has been placed on the Internet</p> <p>12 without your consent?</p> <p>13 A Too many. Every of that is not true.</p> <p>14 It's a fake.</p> <p>15 Q I'm sorry. I want to make sure I</p> <p>16 understand.</p> <p>17 Is it your testimony that there are</p> <p>18 fake discussions between you and CCP or PRC</p> <p>19 officials on the Internet?</p> <p>20 MR. HARMON: Object to the form</p> <p>21 of the question.</p> <p>22 A Many of those postings were fake.</p> <p>23 INTERPRETER WILKINSON: The</p> <p>24 witness also said I don't know where</p> <p>25 they are from.</p> <p style="text-align: right;">Page 278</p>

12 (Pages 275 to 278)

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<p>1 GUO WENGUI</p> <p>2 INTERPRETER CHANG: I don't</p> <p>3 think so. You can ask him to repeat</p> <p>4 it.</p> <p>5 MR. HARMON: Next question. The</p> <p>6 substance is the same.</p> <p>7 Q I'm going to know play for you, sir,</p> <p>8 what we have previously distributed as video 8.</p> <p>9 This again will be on a flash drive, and it is a</p> <p>10 voice recording, even though you'll see that it's</p> <p>11 on YouTube so you will see that there are pictures</p> <p>12 here. What I'm playing for you and asking you</p> <p>13 about is the voice recording itself.</p> <p>14 MR. HARMON: Mr. Greim, are you</p> <p>15 planning on playing the entire type?</p> <p>16 MR. GREIM: No. We won't finish</p> <p>17 if we try to go through all of these.</p> <p>18 MR. HARMON: That's what I'm</p> <p>19 asking.</p> <p>20 MR. GREIM: I'm going to play</p> <p>21 the first two minutes of a 23-minute</p> <p>22 video, and then I will stop in</p> <p>23 between on the transcript if you're</p> <p>24 following along on page 1363. I'll</p> <p>25 stop after Mr. Wengui's comments</p> <p style="text-align: right;">Page 279</p>	<p>1 GUO WENGUI</p> <p>2 Q Were any members of your family</p> <p>3 present in your apartment during this meeting?</p> <p>4 A No.</p> <p>5 Q Did meet with Mr. Liu for more than</p> <p>6 one day in your apartment?</p> <p>7 MR. HARMON: Object to the form</p> <p>8 of the question.</p> <p>9 A Yes.</p> <p>10 Q On how many days did you meet him?</p> <p>11 A Three times within three days.</p> <p>12 Q Was your family present for at least</p> <p>13 one of those meetings?</p> <p>14 MR. HARMON: Object to the form</p> <p>15 of the question.</p> <p>16 A I have no way to answer his question.</p> <p>17 Q I'm sorry. Is your testimony that</p> <p>18 you cannot remember or that they were not there?</p> <p>19 MR. HARMON: Object to the form</p> <p>20 of the question.</p> <p>21 A I don't remember.</p> <p>22 Q Did Mr. Liu offer to allow you to</p> <p>23 keep some of your mainland assets?</p> <p>24 A No.</p> <p>25 Q Did Mr. Liu praise you for the</p> <p style="text-align: right;">Page 281</p>
<p>1 GUO WENGUI</p> <p>2 right before minute 2.</p> <p>3 MR. HARMON: Before you ask a</p> <p>4 question, Mr. Greim, the video that</p> <p>5 you're playing has static pictures.</p> <p>6 It's static pictures and a voice</p> <p>7 recording.</p> <p>8 Q So my question is from the excerpt</p> <p>9 that you heard so far, is this a voice recording</p> <p>10 of a meeting between you and Liu Yuan Ping?</p> <p>11 A Yes.</p> <p>12 Q And is this a recording that you</p> <p>13 made?</p> <p>14 A Yes.</p> <p>15 Q Is this a recording, at least the</p> <p>16 section that you've listened to, a recording that</p> <p>17 you placed on the Internet?</p> <p>18 A Yes.</p> <p>19 Q Did the meeting take place at your</p> <p>20 apartment?</p> <p>21 A I don't remember.</p> <p>22 Q Do you remember meeting with Mr. Liu</p> <p>23 anywhere other than your apartment in New York</p> <p>24 City in May of 2017?</p> <p>25 A No.</p> <p style="text-align: right;">Page 280</p>	<p>1 GUO WENGUI</p> <p>2 contributions you had made to your country?</p> <p>3 A I don't remember he said that.</p> <p>4 Q Have you discussed with Mr. Liu that</p> <p>5 you have made contributions to your country in the</p> <p>6 past?</p> <p>7 MR. HARMON: Object to the form</p> <p>8 of the question.</p> <p>9 A No.</p> <p>10 Q Did you discuss with Mr. Liu the</p> <p>11 charges that have been brought against you in</p> <p>12 China?</p> <p>13 MR. HARMON: Object to the form</p> <p>14 of the question.</p> <p>15 A I don't recall.</p> <p>16 Q Do you remember on which of the three</p> <p>17 days the recording we just listened to was made?</p> <p>18 A This has nothing to do with that</p> <p>19 particular date. This conversation was happened</p> <p>20 during March.</p> <p>21 Q So Mr. Guo, is it your testimony that</p> <p>22 Mr. Liu was present to talk with you in March?</p> <p>23 MR. HARMON: Object to the form</p> <p>24 of the question.</p> <p>25 A I repeated that he only met me during</p> <p style="text-align: right;">Page 282</p>

13 (Pages 279 to 282)

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<p>1 GUO WENGUI</p> <p>2 May, so don't lie about any other time.</p> <p>3 Q I'm sorry then. Is it your testimony</p> <p>4 that the recording we just listened to is a phone</p> <p>5 recording?</p> <p>6 A Yes.</p> <p>7 Q So did you agree with Mr. Liu not to</p> <p>8 talk about your allegations regarding the CCP in</p> <p>9 public?</p> <p>10 A No.</p> <p>11 Q Mr. Guo, I'm now going to play for</p> <p>12 you a section of the recording that starts at</p> <p>13 20:30 and goes to 21:30.</p> <p>14 If you're following along on your</p> <p>15 transcript, that's page 1374 to 1375.</p> <p>16 (At this time a recording was</p> <p>17 played.)</p> <p>18 Q Okay. I stopped actually at 21:33,</p> <p>19 for the record.</p> <p>20 MR. HARMON: Where did you stop?</p> <p>21 MR. GREIM: 21:33.</p> <p>22 Q Mr. Guo, did you hear other voices in</p> <p>23 the background of this recording?</p> <p>24 A Yes, I heard.</p> <p>25 Q Did you hear a metallic sound like</p> <p style="text-align: right;">Page 283</p>	<p>1 GUO WENGUI</p> <p>2 entire thing. So I'm going to play for you the</p> <p>3 first of three minutes of this recording, sir.</p> <p>4 For the record, once again, this is</p> <p>5 a -- from YouTube, and it has two still images on</p> <p>6 a background of a world map. And the Chinese</p> <p>7 being spoken is transcribed on the video both in</p> <p>8 Chinese and in English. But the transcription</p> <p>9 that I have given out is from a certified</p> <p>10 translation done in this case.</p> <p>11 MR. HARMON: Does the certified</p> <p>12 translation differ from what's on the</p> <p>13 screen?</p> <p>14 MR. GREIM: It absolutely does</p> <p>15 in the English translation.</p> <p>16 Absolutely.</p> <p>17 INTERPRETER WILKINSON: Also</p> <p>18 that the counsel said the</p> <p>19 translation -- the certified</p> <p>20 translation, is that different from</p> <p>21 the transcription on the screen.</p> <p>22 Yes, it is very different in English.</p> <p>23 MR. GREIM: I did not say it is</p> <p>24 very different. I said it's</p> <p>25 absolutely different.</p> <p style="text-align: right;">Page 285</p>
<p>1 GUO WENGUI</p> <p>2 silverware?</p> <p>3 A Yes.</p> <p>4 Q Did you also hear Mr. Liu say that --</p> <p>5 indicate that you had brought a recording device?</p> <p>6 MR. HARMON: Objection to the</p> <p>7 form of the question.</p> <p>8 A I don't remember.</p> <p>9 Q My question is about the clip we just</p> <p>10 heard. Let me be clear. Did you hear Mr. Liu</p> <p>11 indicate that you had brought a recording device?</p> <p>12 A No.</p> <p>13 Q Did you say that, in fact, to</p> <p>14 Mr. Liu?</p> <p>15 MR. HARMON: Object to the form</p> <p>16 of the question.</p> <p>17 A I don't recall.</p> <p>18 Q Does listening to this part of the</p> <p>19 clip indicate to you that, in fact, this is a</p> <p>20 recording of an in-person meeting that you had</p> <p>21 with Mr. Liu?</p> <p>22 A I really don't recall.</p> <p>23 Q I'm now going to play what we have</p> <p>24 marked as video 9. This is an especially long</p> <p>25 recording. So once again, I will not play the</p> <p style="text-align: right;">Page 284</p>	<p>1 GUO WENGUI</p> <p>2 Q By the way, I did not intend to say</p> <p>3 they are greatly different, but they are each in</p> <p>4 English translation from Chinese, and so they are</p> <p>5 definitely different. They are not identical.</p> <p>6 I will now play the tape.</p> <p>7 (At this time, the tape was played.)</p> <p>8 Q I stopped at 3:03.</p> <p>9 Mr. Guo, do you recognize this as a</p> <p>10 recording of a meeting that you had with Mr. Liu</p> <p>11 Yuan Ping?</p> <p>12 MR. HARMON: Object to the form</p> <p>13 of the question.</p> <p>14 A Yes.</p> <p>15 Q And would this have taken place in</p> <p>16 your apartment?</p> <p>17 A Yes.</p> <p>18 Q And should there be a video component</p> <p>19 to this recording?</p> <p>20 MR. HARMON: Object to the form</p> <p>21 of the question.</p> <p>22 A It should be a part of a video, that</p> <p>23 recording.</p> <p>24 Q And in the video recording were both</p> <p>25 you and Mr. Liu shown on the screen together at</p> <p style="text-align: right;">Page 286</p>

14 (Pages 283 to 286)

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<p>1 GUO WENGUI</p> <p>2 the same time?</p> <p>3 MR. HARMON: Object to the form</p> <p>4 of the question.</p> <p>5 A I don't recall.</p> <p>6 Q I will represent to you that this</p> <p>7 particular clip lasts for one hour, 19 minutes and</p> <p>8 29 seconds.</p> <p>9 My question to you is did you have</p> <p>10 discussions with Mr. Liu on the same day before</p> <p>11 the beginning of the clip that we just heard?</p> <p>12 A I told you earlier between March and</p> <p>13 April, for over 100 hours of conversation I had</p> <p>14 with them it was the detention of my family</p> <p>15 members and threats against my wife and my</p> <p>16 daughter.</p> <p>17 INTERPRETER WILKINSON: And my</p> <p>18 brother.</p> <p>19 Q Say that again.</p> <p>20 A And my brother.</p> <p>21 Q My question is about this day. My</p> <p>22 question is: Did you have discussions with</p> <p>23 Mr. Liu on the same day before the beginning of</p> <p>24 the recording that I played for you here?</p> <p>25 A I don't recall.</p> <p style="text-align: right;">Page 287</p>	<p>1 GUO WENGUI</p> <p>2 that you heard this recording?</p> <p>3 A I don't remember.</p> <p>4 Q Do you recall having a meeting around</p> <p>5 this same time with a Mr. Kowel? (Phonetic)</p> <p>6 A I don't remember.</p> <p>7 Q Do you know who Mr. Kowel is?</p> <p>8 A I don't know.</p> <p>9 Q Do you know who Kowel Guiang Bal</p> <p>10 (Phonetic) is?</p> <p>11 A No. I don't know this person.</p> <p>12 Q Did you tell Mr. Liu that Mr. Kowel</p> <p>13 is an old comrade in the Ministry of State</p> <p>14 Security?</p> <p>15 A I don't remember saying that.</p> <p>16 Q Did you speak with any officials in</p> <p>17 China at the same time that Mr. Liu was visiting</p> <p>18 you?</p> <p>19 A Yes.</p> <p>20 Q Who?</p> <p>21 A Many of them, or quite a few of them.</p> <p>22 Q To be very clear, my question is</p> <p>23 limited to the time when Mr. Liu was visiting you</p> <p>24 in New York. I would like you to tell me the</p> <p>25 names of the officials what you spoke with over</p> <p style="text-align: right;">Page 289</p>
<p>1 GUO WENGUI</p> <p>2 Q Let me ask you this. Which of the</p> <p>3 three days was this recording made?</p> <p>4 A It's very clear that in the</p> <p>5 transcription it's on the 24th.</p> <p>6 Q Do you recall whether that was the</p> <p>7 first, second or third day of your meetings with</p> <p>8 Mr. Liu?</p> <p>9 A I don't recall.</p> <p>10 Q Did Mr. Liu go to Washington, D.C.</p> <p>11 after meeting with you in New York?</p> <p>12 MR. HARMON: Object to the form</p> <p>13 of the question.</p> <p>14 A Yes.</p> <p>15 Q Did he come back to meet with you</p> <p>16 again after he was done with his meetings in</p> <p>17 Washington?</p> <p>18 A Yes.</p> <p>19 Q Did you record any of your meetings</p> <p>20 with him upon his return from Washington?</p> <p>21 A I don't remember.</p> <p>22 Q Did you make any effort to search for</p> <p>23 these recordings before your deposition today?</p> <p>24 A No.</p> <p>25 Q When was the last time before today</p> <p style="text-align: right;">Page 288</p>	<p>1 GUO WENGUI</p> <p>2 the phone during the time Mr. Liu was visiting you</p> <p>3 in New York.</p> <p>4 MR. HARMON: Object to the form</p> <p>5 of the question.</p> <p>6 A I don't quite remember the details.</p> <p>7 Q Was one of the officials Wang Ti</p> <p>8 Shan?</p> <p>9 A He's an arch enemy. I'm very strange</p> <p>10 about you mentioning this person. I would like to</p> <p>11 just yell at him if I can see him.</p> <p>12 Q What phone did you use to confer with</p> <p>13 these Chinese officials during the time of</p> <p>14 Mr. Li's visit?</p> <p>15 A I don't remember.</p> <p>16 Q What about secretary Meng?</p> <p>17 (Phonetic)</p> <p>18 MR. HARMON: Object to the form</p> <p>19 of the question. Are you asking</p> <p>20 whether he spoke with him during that</p> <p>21 time?</p> <p>22 Q Did you speak with secretary Meng</p> <p>23 over the phone?</p> <p>24 MR. HARMON: Ever?</p> <p>25 A The Meng, there are millions of</p> <p style="text-align: right;">Page 290</p>

15 (Pages 287 to 290)

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<p>1 GUO WENGUI</p> <p>2 May of 2017, when is the next time you</p> <p>3 communicated in any with the CCP or PRC official?</p> <p>4 A I don't remember.</p> <p>5 Q By the way, Mr. Liu also spoke</p> <p>6 directly with Guo Mei, didn't he?</p> <p>7 MR. HARMON: Objection to the</p> <p>8 form of the question.</p> <p>9 A I don't know.</p> <p>10 Q Did Mr. Liu tell you that he had</p> <p>11 spoken with Guo Mei before your meeting with him</p> <p>12 and had obtained a letter from her?</p> <p>13 MR. HARMON: Object to the form</p> <p>14 of the question.</p> <p>15 A I don't remember.</p> <p>16 Q Did you have any communications with</p> <p>17 CCP or PRC officials after May, 2017 through</p> <p>18 either of your children?</p> <p>19 MR. HARMON: Object to the form</p> <p>20 of the question.</p> <p>21 A No.</p> <p>22 Q Did either of your children convey</p> <p>23 messages to you after May, 2017 from any CCP or</p> <p>24 PRC official?</p> <p>25 A No.</p> <p style="text-align: right;">Page 295</p>	<p>1 GUO WENGUI</p> <p>2 MR. GREIM: Our position is it</p> <p>3 is within the scope because we</p> <p>4 believe that Mr. Bannon served as an</p> <p>5 intermediary. But we won't need to</p> <p>6 do this on the record here.</p> <p>7 Q Did you write a letter to Senior CCP</p> <p>8 officials in August of 2017?</p> <p>9 A I don't recall.</p> <p>10 INTERPRETER WILKINSON: August.</p> <p>11 INTERPRETER CHANG: Did you say</p> <p>12 August?</p> <p>13 Q Yes.</p> <p>14 A I don't remember.</p> <p>15 Q I'm going to show you now, sir, what</p> <p>16 we have transcribed as video 4, which is, I will</p> <p>17 represent to you, a portion of a minute Ming Jing</p> <p>18 broadcast in which you are interviewed by a Ming</p> <p>19 Jing reporter. This is again video 4.</p> <p>20 Before I do that, Mr. Guo, I think</p> <p>21 you testified earlier that you have appeared on</p> <p>22 Ming Jing before; is that correct?</p> <p>23 A Yes.</p> <p>24 Q And what is the name of the reporter</p> <p>25 who typically questions you on the program?</p> <p style="text-align: right;">Page 297</p>
<p>1 GUO WENGUI</p> <p>2 Q Did any other person communicate</p> <p>3 messages from you to CCP or PRC officials after</p> <p>4 May of 2017?</p> <p>5 MR. HARMON: Objection to the</p> <p>6 form of the question.</p> <p>7 A No.</p> <p>8 Q Did any other person communicate</p> <p>9 messages from CCP or PRC officials to you after</p> <p>10 May of 2017?</p> <p>11 A No.</p> <p>12 Q Did Mr. Steve Bannon communicate</p> <p>13 messages from you to any CCP or PRC official or</p> <p>14 from any CCP or PRC official to you after May of</p> <p>15 2017.</p> <p>16 A No. That is ridiculous.</p> <p>17 Q Did Mr. Bannon report to you on his</p> <p>18 September, 2017 meeting with Wan Chi Shan when he</p> <p>19 met with you in October of 2017?</p> <p>20 MR. HARMON: Object to the form</p> <p>21 of the question. I think that's</p> <p>22 beyond the scope of what you're</p> <p>23 entitled to inquire about.</p> <p>24 In fact, I'm sure of it. I'll</p> <p>25 direct the witness not to answer.</p> <p style="text-align: right;">Page 296</p>	<p>1 GUO WENGUI</p> <p>2 MR. HARMON: Objection to the</p> <p>3 form of the question.</p> <p>4 A I don't remember exactly.</p> <p>5 Q Is his name Mr. Cheen?</p> <p>6 A Yes. The one by the last name</p> <p>7 C-H-E-E-N. Xioping, X-I-O-P-I-N-G.</p> <p>8 Q The transcription begins on page SVUS</p> <p>9 1320. I will now play it for you?</p> <p>10 MR. HARMON: You said 1320?</p> <p>11 MR. GREIM: Correct. SVUS1320.</p> <p>12 MR. HARMON: Video 4?</p> <p>13 MR. GREIM: Video 4.</p> <p>14 MR. HARMON: Mine begins on 1331</p> <p>15 unless there is a 4A.</p> <p>16 MR. GREIM: There is a 4A. I'm</p> <p>17 not sure why that's true, but this is</p> <p>18 video 4.</p> <p>19 MR. HARMON: Give me a moment.</p> <p>20 Q I will play for you from the very</p> <p>21 beginning of the tape through the beginning of</p> <p>22 minute 6.</p> <p>23 MR. HARMON: Do you need to play</p> <p>24 six minutes worth of tape to</p> <p>25 determine whether it's him?</p> <p style="text-align: right;">Page 298</p>

17 (Pages 295 to 298)

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<p>1 GUO WENGUI</p> <p>2 MR. GREIM: We do and you'll see</p> <p>3 why in a minute.</p> <p>4 MR. HARMON: I am sure I will</p> <p>5 not see why, but it seems like a</p> <p>6 waste of time.</p> <p>7 MR. GREIM: Go ahead.</p> <p>8 MR. HARMON: I just think it</p> <p>9 doesn't take six minutes of playing</p> <p>10 for him to determine whether it's</p> <p>11 authentic.</p> <p>12 Q Before I hit play on this, Mr. Guo,</p> <p>13 can you see my -- can you see the computer I have</p> <p>14 here?</p> <p>15 A Yes.</p> <p>16 Q Do you recognize Mr. Chen and</p> <p>17 yourself in the screen?</p> <p>18 A Yes.</p> <p>19 Q I will now play this. What I may do</p> <p>20 is I may break it up in the middle, but I will</p> <p>21 start, and then I'll announce when I stop.</p> <p>22 (At this time the video was played.)</p> <p>23 Q I'm going to stop for a moment. I</p> <p>24 stopped at second 32.</p> <p>25 Mr. Guo, I think I'm going to</p> <p style="text-align: right;">Page 299</p>	<p>1 GUO WENGUI</p> <p>2 are from (inaudible) Wang Chi Sung.</p> <p>3 There are hundreds and millions of</p> <p>4 such fake clips on the Internet. I cannot say</p> <p>5 this is authentic one. I can only recognize my</p> <p>6 own face and my tie. Nothing else I can identify.</p> <p>7 Q So is it your testimony, sir, that</p> <p>8 you did not appear on Ming Ging and talk about a</p> <p>9 letter that you wrote to President Gi and</p> <p>10 Secretary Mang Giangu? (Phonetic)</p> <p>11 MR. HARMON: Object to the form</p> <p>12 of the question.</p> <p>13 INTERPRETER WILKINSON: Counsel,</p> <p>14 your question was are you saying that</p> <p>15 you never appear on the media with</p> <p>16 the Ming Ging and then talking about</p> <p>17 this letter you wrote to Wung Gi</p> <p>18 Shan.</p> <p>19 INTERPRETER CHANG: No. No.</p> <p>20 Let me repeat the question. It's not</p> <p>21 yours.</p> <p>22 INTERPRETER WILKINSON: I'm</p> <p>23 marking some of your questions</p> <p>24 because the interpreter did not</p> <p>25 interpret the question like that;</p> <p style="text-align: right;">Page 301</p>
<p>1 GUO WENGUI</p> <p>2 approach you so you can actually view the letter</p> <p>3 that's displayed on the screen on the broadcast.</p> <p>4 I'm just going to come a little</p> <p>5 closer. I'm going to hit play, and we may not go</p> <p>6 all the way through five minutes. I've stopped it</p> <p>7 at minute 53.</p> <p>8 Mr. Guo, did you recognize the letter</p> <p>9 that the host displayed on the screen while</p> <p>10 speaking with you?</p> <p>11 A No.</p> <p>12 Q Do you recognize this as a broadcast</p> <p>13 that you did with Mr. Chen?</p> <p>14 MR. HARMON: Object to the form</p> <p>15 of the question.</p> <p>16 A No.</p> <p>17 Q For the record, I'm going to play</p> <p>18 again at minute 5:11. I've stopped it at 6</p> <p>19 minutes and 56 seconds.</p> <p>20 I would now ask you, Mr. Guo, is this</p> <p>21 not a video of your appearance on Ming Ging with</p> <p>22 Mr. Chin?</p> <p>23 A Ming Ging is representing Chinese</p> <p>24 Communist Party. They are making accusations and</p> <p>25 lies and everything. All their friends are from</p> <p style="text-align: right;">Page 300</p>	<p>1 GUO WENGUI</p> <p>2 right?</p> <p>3 MR. HARMON: Ask the question</p> <p>4 again and have it interpreted again.</p> <p>5 Maybe break down the question into</p> <p>6 pieces so that it's easy to</p> <p>7 translate.</p> <p>8 Q Mr. Guo, do you deny that I have just</p> <p>9 shown you a clip of your appearance on Ming Jing</p> <p>10 TV?</p> <p>11 MR. HARMON: Object to the form</p> <p>12 of the question.</p> <p>13 A I cannot validate the timing of the</p> <p>14 content of this interview. I simply do not</p> <p>15 recall.</p> <p>16 Q Did you not tell the host that your</p> <p>17 letter was written to President Gi and Secretary</p> <p>18 Ming Gian Ju? (Phonetic)</p> <p>19 MR. HARMON: Object to the form</p> <p>20 of the question.</p> <p>21 A I don't remember.</p> <p>22 Q Do you deny that you wrote the letter</p> <p>23 that was displayed on this broadcast?</p> <p>24 MR. HARMON: Object to the form</p> <p>25 of the question.</p> <p style="text-align: right;">Page 302</p>

18 (Pages 299 to 302)

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<p>1 GUO WENGUI</p> <p>2 A I don't remember.</p> <p>3 Q Who drafted the letter?</p> <p>4 MR. HARMON: Object to the form</p> <p>5 of the question.</p> <p>6 A I really don't know.</p> <p>7 Q Did you sign it?</p> <p>8 MR. HARMON: Object to the form</p> <p>9 of the question.</p> <p>10 A I don't remember.</p> <p>11 Q Did you transmit it to anyone?</p> <p>12 MR. HARMON: Object to the form</p> <p>13 of the question.</p> <p>14 A I don't remember.</p> <p>15 Q So you neither admit nor deny that I</p> <p>16 have shown you a portion of a clip of an</p> <p>17 appearance you made on Mira Media?</p> <p>18 MR. HARMON: Object to the form</p> <p>19 of the question.</p> <p>20 A I had many interviews with them, but</p> <p>21 I don't remember this particular one.</p> <p>22 Q Do you recall being given a red line</p> <p>23 by the CCP or PRC officials that you could not</p> <p>24 cross?</p> <p>25 MR. HARMON: Object to the form</p> <p style="text-align: right;">Page 303</p>	<p>1 GUO WENGUI</p> <p>2 approach the witness one more time.</p> <p>3 (At this time, the video was played).</p> <p>4 A I want to make sure I understand.</p> <p>5 Who is asking questions, you the lawyer, or the</p> <p>6 video? The guy who is a cheater is asking</p> <p>7 questions.</p> <p>8 Q Mr. Guo, you have to stop disrupting</p> <p>9 the deposition.</p> <p>10 MR. HARMON: Okay. He's not</p> <p>11 disrupting the deposition.</p> <p>12 MR. GREIM: Yes, he is. This is</p> <p>13 ridiculous.</p> <p>14 MR. HARMON: Ask your next</p> <p>15 question.</p> <p>16 MR. GREIM: I can't because the</p> <p>17 witness just keeps talking.</p> <p>18 MR. HARMON: Ask your next</p> <p>19 question.</p> <p>20 MR. GREIM: We will have to ask</p> <p>21 for more time if this continues.</p> <p>22 MR. HARMON: Ask your next</p> <p>23 question.</p> <p>24 Q The question, sir, is do you</p> <p>25 recognize the signature on the document I placed</p> <p style="text-align: right;">Page 305</p>
<p>1 GUO WENGUI</p> <p>2 of the question.</p> <p>3 A I don't understand what you referring</p> <p>4 to. Because like Trump, everything is talking</p> <p>5 about it. She has friends. Now he also want to</p> <p>6 stop Hua Wei.</p> <p>7 MR. GREIM: Move to strike.</p> <p>8 A The telecom company in China, that's</p> <p>9 what he's referring to.</p> <p>10 MR. GREIM: Move to strike as</p> <p>11 non-responsive.</p> <p>12 Q Did you receive any communications</p> <p>13 from the CCP or PRC in response to this letter?</p> <p>14 MR. HARMON: Object to the form</p> <p>15 of the question.</p> <p>16 A I don't understand and I don't</p> <p>17 remember.</p> <p>18 Q What don't you understand about my</p> <p>19 question?</p> <p>20 MR. HARMON: Object to the form</p> <p>21 of the question.</p> <p>22 A Because I don't know what you said</p> <p>23 about this letter.</p> <p>24 Q Do you recall?</p> <p>25 MR. GREIM: I'm going to</p> <p style="text-align: right;">Page 304</p>	<p>1 GUO WENGUI</p> <p>2 in front of you on my computer.</p> <p>3 A It's my name, but I don't think</p> <p>4 that's my signature.</p> <p>5 Q So Mr. Guo, do you deny sending this</p> <p>6 letter to CCP and PRC officials in August of 2017?</p> <p>7 MR. HARMON: Object to the form</p> <p>8 of the question.</p> <p>9 A I've never sent this letter.</p> <p>10 Q Did anyone send this letter to CCP</p> <p>11 and PRC officials on your behalf?</p> <p>12 MR. HARMON: Object to the form</p> <p>13 of the question.</p> <p>14 A That I wouldn't know.</p> <p>15 Q Have you seen it before today?</p> <p>16 A It's all over on the Internet.</p> <p>17 Q Did you agree to the terms in this</p> <p>18 letter?</p> <p>19 MR. HARMON: Object to the form</p> <p>20 of the question.</p> <p>21 A I totally do not agree with any of</p> <p>22 the terms in this letter.</p> <p>23 Q In August of 2017, did you agree to</p> <p>24 the terms of the letter?</p> <p>25 MR. HARMON: Asked and answered.</p> <p style="text-align: right;">Page 306</p>

19 (Pages 303 to 306)

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<p>1 GUO WENGUI</p> <p>2 MR. HARMON: Object to the form</p> <p>3 of the question.</p> <p>4 INTERPRETER WILKINSON: The</p> <p>5 video, not just the interview. The</p> <p>6 video of this interview.</p> <p>7 A I have been interviewed by them for</p> <p>8 more than once, but I cannot tell you the</p> <p>9 authenticity of this one.</p> <p>10 MR. GREIM: Let's go ahead and</p> <p>11 take a break.</p> <p>12 (At this time, a brief recess</p> <p>13 was taken.)</p> <p>14 THE VIDEOGRAPHER: The time is</p> <p>15 2:08 p.m., Wednesday, December 4,</p> <p>16 2019. This is the end of media</p> <p>17 number 2, volume 2 of the videotaped</p> <p>18 deposition of Mr. Guo Wengui.</p> <p>19 We're off the record.</p> <p>20 (Time noted: 2:08 p.m.)</p> <p>21 (At this time, a brief recess</p> <p>22 was taken.)</p> <p>23 THE VIDEOGRAPHER: The time is</p> <p>24 2:19 p.m., Wednesday, December 4,</p> <p>25 2019. This is media number 3, volume</p> <p style="text-align: right;">Page 315</p>	<p>1 GUO WENGUI</p> <p>2 any signals to anybody. She's going</p> <p>3 to stay where she is.</p> <p>4 MR. GREIM: She has been and it</p> <p>5 needs to stop.</p> <p>6 MR. HARMON: She's going to stay</p> <p>7 where she is. She hasn't done</p> <p>8 anything, and she is not moving, so</p> <p>9 go ahead.</p> <p>10 Q What are some of the other names that</p> <p>11 Mr. Yu goes by?</p> <p>12 A I don't know.</p> <p>13 MR. HARMON: Really? You're</p> <p>14 going to video her?</p> <p>15 INTERPRETER WILKINSON: I'm</p> <p>16 going to video her.</p> <p>17 MR. GREIM: No, you're not.</p> <p>18 We'll raise this with the court</p> <p>19 later.</p> <p>20 Q Do you know the name William Je, J-E?</p> <p>21 A They are the same person, William Je</p> <p>22 and William Yu.</p> <p>23 Q What about the name Je Kay Ming?</p> <p>24 A I don't know this person.</p> <p>25 Q Do you know the name Yu Gian Ming?</p> <p style="text-align: right;">Page 317</p>
<p>1 GUO WENGUI</p> <p>2 2 of the videotaped deposition of</p> <p>3 Mr. Guo Wengui. We are back on the</p> <p>4 record.</p> <p>5 EXAMINATION BY</p> <p>6 MR. GREIM:</p> <p>7 Q Mr. Guo, your first deposition I</p> <p>8 asked you some questions about a man we identified</p> <p>9 as William Yu.</p> <p>10 Do you remember those questions?</p> <p>11 A Yes.</p> <p>12 Q Do you know him by any other names?</p> <p>13 A I don't know.</p> <p>14 MR. GREIM: Before we go much</p> <p>15 further, I just want to point out we</p> <p>16 object to Miss Wang standing back</p> <p>17 behind the videographer directly in</p> <p>18 the line of sight of the witness.</p> <p>19 There have been a lot of facial</p> <p>20 gestures, nodding yes and no on</p> <p>21 questions, and I would like that</p> <p>22 stopped.</p> <p>23 A You're totally lying.</p> <p>24 MR. HARMON: I've been looking</p> <p>25 at Miss Wang. She's not providing</p> <p style="text-align: right;">Page 316</p>	<p>1 GUO WENGUI</p> <p>2 A William used the Chinese name.</p> <p>3 Q Do you know which of those is his</p> <p>4 legal name?</p> <p>5 MR. HARMON: Object to the form</p> <p>6 of the question.</p> <p>7 A I don't know.</p> <p>8 Q Do you know what country or countries</p> <p>9 he's a citizen in?</p> <p>10 A I don't know.</p> <p>11 Q When did you last see him?</p> <p>12 A About two months ago.</p> <p>13 Q Where was this?</p> <p>14 A In New York.</p> <p>15 Q How frequently do you see Mr. Gi?</p> <p>16 MR. HARMON: Object to the form</p> <p>17 of the question.</p> <p>18 A Three, four times. Two to three</p> <p>19 times a year.</p> <p>20 Q Do you E-mail or call him?</p> <p>21 A Calling him.</p> <p>22 Q Where did you first meet Mr. Gi?</p> <p>23 A In the office on the social occasion.</p> <p>24 Q Which office?</p> <p>25 A I don't know. I really don't recall</p> <p style="text-align: right;">Page 318</p>

22 (Pages 315 to 318)

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<p>1 GUO WENGUI</p> <p>2 that.</p> <p>3 Q Is this in Beijing?</p> <p>4 A I don't recall.</p> <p>5 Q Are you aware that he is a director</p> <p>6 of an entity whose name includes AC?</p> <p>7 MR. HARMON: Object to the form</p> <p>8 of the question. It was asked and</p> <p>9 answered at the last deposition.</p> <p>10 A Yes.</p> <p>11 Q How did he come to be a director of</p> <p>12 ACA?</p> <p>13 A I don't know.</p> <p>14 Q Is ACA an entity that you started?</p> <p>15 A I don't know.</p> <p>16 MR. HARMON: Yvette, come around</p> <p>17 the other side please.</p> <p>18 MR. GREIM: Miss Wang is sitting</p> <p>19 around directly behind my client.</p> <p>20 MR. HARMON: Yvette, please come</p> <p>21 around.</p> <p>22 I would ask you, Mr. Greim, to</p> <p>23 ask your client even if she's only</p> <p>24 using her phone for the purposes to</p> <p>25 keep it down so it doesn't appear</p> <p style="text-align: right;">Page 319</p>	<p>1 GUO WENGUI</p> <p>2 A Because he told me that the</p> <p>3 government that take his people in Hong Kong and</p> <p>4 that the police went to threats that his mother in</p> <p>5 her home and get him so frightened that he had to</p> <p>6 be hospitalized.</p> <p>7 INTERPRETER WILKINSON: And</p> <p>8 every day people call him telling him</p> <p>9 to kill him; right?</p> <p>10 A Yes. He also said they are making</p> <p>11 the phone calls that threaten them by killing them</p> <p>12 making daily phone calls.</p> <p>13 Q When did Mr. Gi first tell you that</p> <p>14 the government was persecuting his people in Hong</p> <p>15 Kong?</p> <p>16 A I don't remember exactly.</p> <p>17 Q Did you know Mr. Gi before you came</p> <p>18 to the United States in 2015?</p> <p>19 MR. HARMON: Object to the form</p> <p>20 of the question.</p> <p>21 A Yes.</p> <p>22 Q How?</p> <p>23 A I don't remember.</p> <p>24 Q Were you a client of his?</p> <p>25 A No.</p> <p style="text-align: right;">Page 321</p>
<p>1 GUO WENGUI</p> <p>2 that she's taking videos and photos.</p> <p>3 MR. GREIM: I would ask the same</p> <p>4 thing of Miss Wang.</p> <p>5 MR. HARMON: Absolutely.</p> <p>6 Everybody put their phones down.</p> <p>7 MR. GREIM: That's the new rule.</p> <p>8 Q You recall your first deposition you</p> <p>9 claimed you worked with Mr. Gi on anti-communist</p> <p>10 matters?</p> <p>11 MR. HARMON: Object to the form</p> <p>12 of the question.</p> <p>13 A I don't remember.</p> <p>14 Q Is it true that you have worked with</p> <p>15 Mr. Gi in the past on what you characterize as</p> <p>16 anti-communist matters?</p> <p>17 A I don't know how to say that, the</p> <p>18 working together. But in Chinese, we say we are</p> <p>19 both anti-communists.</p> <p>20 Q How do you know Mr. Gi is</p> <p>21 anti-communist?</p> <p>22 A Because he told me so. He was</p> <p>23 persecuted by the communist party right now.</p> <p>24 Q How do you know Mr. Gi was persecuted</p> <p>25 by the communist party?</p> <p style="text-align: right;">Page 320</p>	<p>1 GUO WENGUI</p> <p>2 Q Did he work for you?</p> <p>3 A No.</p> <p>4 Q Did you know him as chairman of the</p> <p>5 greater China securities section of Maquery?</p> <p>6 (Phonetic)</p> <p>7 MR. HARMON: Object to the form</p> <p>8 of the question.</p> <p>9 A Yes.</p> <p>10 Q Did you recruit him to leave Maquery</p> <p>11 and join ACA?</p> <p>12 A I don't remember.</p> <p>13 Q Did you ask him to join ACA?</p> <p>14 A No.</p> <p>15 Q How was ACA formed?</p> <p>16 MR. HARMON: These questions</p> <p>17 were asked and answered at his last</p> <p>18 deposition.</p> <p>19 A No, I don't know.</p> <p>20 Q Mr. Guo, did you solicit money from</p> <p>21 investors in the United Emirates to begin ACA?</p> <p>22 MR. HARMON: I'm going to permit</p> <p>23 Mr. Guo to answer this question, but</p> <p>24 it's clearly outside the very limited</p> <p>25 scope that magistrate Freeman</p> <p style="text-align: right;">Page 322</p>

23 (Pages 319 to 322)

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<p>2</p> <p>3 A C K N O W L E D G M E N T</p> <p>4</p> <p>5 STATE OF NEW YORK)</p> <p>6 ss:</p> <p>7 COUNTY OF _____)</p> <p>8</p> <p>9 I, Guo Wengui, hereby certify that I have</p> <p>10 read the transcript of my testimony taken under</p> <p>11 oath in my deposition of December 4, 2019; that</p> <p>12 the transcript is a true and complete record of my</p> <p>13 testimony, and that the answers on the record as</p> <p>14 given by me are true and correct.</p> <p>15</p> <p>16</p> <p>17 _____</p> <p>18 GUO WENGUI</p> <p>19</p> <p>20</p> <p>21 Subscribed and sworn to before me</p> <p>22 this day of 2019.</p> <p>23 _____</p> <p>24 (NOTARY PUBLIC)</p> <p>25</p> <p style="text-align: right;">Page 343</p>	
<p>2</p> <p>3 C E R T I F I C A T E</p> <p>4</p> <p>5 I, Terri Fudens, a stenotype reporter</p> <p>6 and Notary Public within and for the State of New</p> <p>7 York, do hereby certify:</p> <p>8 That the witness whose testimony is</p> <p>9 hereinbefore set forth was duly sworn by me and</p> <p>10 that such testimony is a true record of the</p> <p>11 testimony given by such witness.</p> <p>12 I further certify that I am not related</p> <p>13 to any of the parties by blood or marriage, and</p> <p>14 that I am in no way interested in the outcome of</p> <p>15 this matter.</p> <p>16 IN WITNESS WHEREOF, I have hereunto set</p> <p>17 my hand.</p> <p>18</p> <p>19</p> <p>20</p> <p>21 _____</p> <p>22 Terri Fudens</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: right;">Page 344</p>	

29 (Pages 343 to 344)